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January 25, 2022

**Via US Mail**

Honorable Louis L. Stanton  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Dear Judge Stanton:

Re: *Wilmington Trust, N.A. v. Stout Risius Ross, Inc.*,  
No. 1:20-cv-02505-LLS-KHP (S.D.N.Y.)

We are counsel to the plaintiff, Wilmington Trust, N.A., in this action. On December 13, 2021, the parties participated in a mediation before the Honorable Henry Pitman (Ret.). The mediation session did not result in a resolution, but post-mediation, the parties have continued to engage in good faith settlement discussions. Defendant's insurance carrier is aware of these discussions.

The parties wish to conserve resources while continuing negotiations. Accordingly, the parties jointly request that the Court modify the current scheduling order (Dkt. 41), extending all deadlines by 90 days, to permit the parties time to continue to pursue a possible resolution. This is the parties' first request to extend the scheduling order.

We have enclosed a Proposed Amended Scheduling Order for the Court's consideration.

Respectfully,

*s/ Melissa N. Subjeck*

Melissa N. Subjeck

Enclosure

cc: Lawrence Hirsh, Esq.  
Stanley Bulua, Esq.  
Daniel C. Oliverio, Esq.  
Cynthia Giganti Ludwig, Esq.  
(all via email, with encl.)